

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

GIUSEPPE DIPALMA, on behalf of himself and  
others similarly situated,

Plaintiff,

v.

NEW RESTART INC. d/b/a TAORMINA, NEW  
ORGANICO INC. d/b/a ORGANIKA, SUD123  
INCORPORATED d/b/a CIAO, LOCAL 92 INC.  
d/b/a LOCAL 92, MARCELLO ASSANTE  
DICUPILLO, ZEHUA DICUPILLO and  
ZEHAVA AMIEL,

Defendants.

Case No.: 15-CV-9753

Freeman, M.J.

**NOTICE OF PLAINTIFF'S  
UNOPPOSED MOTION FOR  
APPROVAL OF ATTORNEYS'  
FEES, ADMINISTRATION FEES  
AND REIMBURSEMENT OF  
EXPENSES**

For the reasons set forth in (i) the Memorandum of Law in Support of Plaintiff's Unopposed Motion for Approval of Attorneys' Fees and Reimbursement of Expenses and (ii) the Declaration of C.K. Lee in Support of Plaintiff's Unopposed Motion for Approval of Attorneys' Fees, Administration Fees and Reimbursement of Expenses and Unopposed Motion for Approval of Class Representative Service Award, and the exhibits attached thereto, Plaintiff respectfully requests that the Court enter an Order: (1) awarding Class Counsel \$175,000 in attorneys' fees, which is approximately one-third of the Settlement Fund established by Defendants, plus costs and expenses in the amount of \$2,577.75, to be paid from the Settlement Fund; and (2) awarding Advanced Litigation Strategies, LLC, as Settlement Administrator, administration fees of \$25,000 to be paid from the Settlement Fund.

Dated: August 28, 2018

Respectfully submitted,

LEE LITIGATION GROUP, PLLC

By: /s/ C.K. Lee

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Plaintiffs and the Class*